

**IN THE U.S. DISTRICT COURT FOR MARYLAND,
SOUTHERN DIVISION**

BEYOND SYSTEMS, INC.

Plaintiff

v.

WORLD AVENUE USA, LLC
successor by merger to NIUTECH, LLC.,
DBA "THE USEFUL," ET AL.

Defendants

*
*
*
*
*
*
*
*
*
*

Case No. PJM 08 cv 0921

**PLAINTIFF'S REPLY MEMORANDUM IN SUPPORT OF
MOTION FOR PROTECTIVE ORDER AS TO DEPOSITIONS**

Plaintiff, Beyond Systems, Inc., through counsel, replies to the opposition memorandum filed at DE 527 on November 22, 2010, and in support of the Motion for Protective Order filed at DE 494 on November 5, 2010, and states as follows:

At the motions hearing on November 29, 2010 the Court extended a series of due dates for Plaintiff's responses and filings pursuant to Plaintiff's motion for extension filed at DE 531 on November 24, 2010. Plaintiff asks that the extensions be applied to this reply, nunc pro tunc, as it was the intent to seek extensions as to all discovery-related filings up to November 24, 2010, for the reasons stated in the motion at DE 531, given the need to prepare for the impending hearing and the consequent backlog of work on matters unrelated to the hearing. Plaintiff has requested for defendant's consent, but has not yet heard a response.

Most of the issues in the Motion were resolved by the ruling at DE 544, setting restrictions on depositions during upcoming discovery. That ruling should be regarded as rendering the deposition notices at issue here moot, as it supersedes these notices.

To the extent that the notices may not be superseded by the order at DE 544, Plaintiff

stands on its prior objections and arguments as to both of the depositions noted.

Respectfully Submitted,

/s/

Stephen H. Ring
STEPHEN H. RING, P.C.
506 Main Street, Suite 215
Gaithersburg, Maryland 20878
MD Bar Id. No. 04731764; USDC, MD: #00405
Telephone: 301-563-9249
Facsimile: 301-563-9639

/s/

Michael S. Rothman
E. Jefferson Street, Suite 201
Rockville, MD 20850
Phone: (301) 251-9660
Fax: (301) 251-9610
Attorneys for Plaintiff
Counsel for Plaintiff

Certificate of Service

I certify that a copy of the foregoing documents was served on the date of ECF filing, via the ECF system, on all counsel of record.

/s/

Stephen H. Ring

